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**IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH**

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UNITED STATES OF AMERICA,  
  
Plaintiff,

v.

CLAUD R. KOERBER,  
  
Defendant.

**NOTICE OF EXPERT WITNESS FOR  
THE DEFENSE, CHESLEY  
ERICKSON**

Case No. 2:17-cr-00037 FB

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The Defendant, Claud R. Koerber, by and through counsel, pursuant to Rule 16(b)(1)(C) the Federal Rules of Criminal Procedure, hereby notifies the government of the defendant's intent to call Chesley Erickson as an expert in the field of tax liability and evaluation. Mr. Erickson's curriculum vitae is attached. Mr. Erickson has not prepared a report as of this date. However, when defense counsel receives the report, it will be provided to the government promptly.

In summary, Mr. Erickson will testify as an expert about the correct tax liability for Founders Capital, LLC and Claud R. Koerber personally for the 2005 and 2006 tax years.

Specifically, Mr. Erickson will opine on the accurate tax due and owing, taking into account deductions that the IRS did not account for. Mr. Erickson will also opine on the allegations of tax evasion on the IRS Form 433-A.

Respectfully submitted this 13th day of August, 2018.

/s/ Robert K. Hunt

ROBERT K. HUNT

Assistant Federal Public Defender